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October 18, 2019

Via Electronic Court Filing System

Hon. Barbara Moses, U.S.M.J
United States District Court
Southern District Of New York
500 Pearl Street
New York, NY 10007

Re: *Jocelyn Pettenato et al. v. Beacon Health Options, Inc. et al.*,
Case No. 1:19-cv-1646 JPO-BCM

Dear Magistrate Judge Moses:

Pursuant to this Court's July 8, 2019 Order (ECF No. 59), the Parties jointly submit this letter "addressing (a) whether and to what extent the parties continue to disagree concerning defendants' production of documents and communications related to licenses, accreditation, and/or certifications held by defendants, and (b) whether and to what extent the parties continue to disagree concerning defendants' preservation obligations with regard to electronically stored information."

A. Defendants' documents relating to accreditation, etc.

Defendants have agreed to produce accreditation guides for case management employees. Defendants continue to investigate what communications, including audits and reports, exist between them and accreditation agencies (including URAC and NCQA), and the Parties propose they provide the Court with a supplemental joint report on or before October 29, 2019.

B. Defendants' Preservation Obligations for ESI

The only issue that remains in dispute over Defendants' preservation of certain ESI is Plaintiffs' request that Defendants preserve VPN logs. The Parties are continuing to confer on this issue, and the Parties propose they provide the Court a supplemental joint report on or before October 29, 2019.

Sincerely,

/s/ Maureen A. Salas

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